

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**TQ DELTA, LLC,
Plaintiff,**

§
§ **Civil Action No. 2:21-cv-310-JRG**

v.

§ **JURY TRIAL DEMANDED**

**COMMSCOPE HOLDING COMPANY,
INC. et al**

§

§ 

DECLARATION OF TY WILSON

I, Ty Wilson, state as follows in support of Plaintiff TQ Delta, LLC's Motion for Summary Judgment of No Breach of Any FRAND Obligations (Family 3 and Family 9A Non-Essential Patents):

1. I am an attorney at the Davis Firm, P.C. and counsel of record for Plaintiff TQ Delta, LLC ("TQ Delta"). I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.

2. Exhibit A is a true and correct highlighted copy of the document produced by TQ Delta bearing the Bates numbers TQD_TX00067557 through TQD_TX00067560.

3. Exhibit B is a true and correct highlighted, excerpted copy of CommScope's Sixth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories (Nos. 1-18) dated November 14, 2022.

4. Exhibit C is a true and correct highlighted, excerpted copy of the Opening Expert Report of Todor Cooklev, Ph.D. dated August 29, 2022.

5. Exhibit D is a true and correct highlighted, excerpted copy of Plaintiff TQ Delta's Second Supplemental Objections and Responses to CommScope's First Set of Interrogatories (Nos. 1-35) dated August 19, 2022.

6. Exhibit E is a true and correct highlighted, excerpted copy of the Expert Report of Jonathan D. Putman dated August 29, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of December, 2022, in Dallas, Texas.

/s/ Ty Wilson
Ty Wilson